

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, Plaintiff,)	CASE NO.
v.)	CASE NO. CR 18-577 CRB
MICHAEL RICHARD LYNCH and)	STIPULATION REGARDING BUSINESS
STEPHEN KEITH CHAMBERLAIN,)	RECORDS OF HSBC
Defendants.)	

The United States and Defendants Michael Richard Lynch and Stephen Keith Chamberlain hereby stipulate that the following documents are (1) business records pursuant to Federal Rule of Evidence 803(6) because they were made at or near the time by someone with knowledge; kept in the course of regularly conducted business; and made as part of a regular business activity; and (2) are authentic pursuant to Federal Rule of Evidence 901, 902(11), 902(13), and/or 902(14).

Exhibit	Description	Custodian
11999	Premier Bank statement for acct# ending 1627, Sushovan Hussain	HSBC
12000	Premier Bank statement for acct# ending 1627, Sushovan Hussain	HSBC

STIP RE BUSINESS RECORDS (HSBC)
CASE NO. CR 18-577 CRB

1

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION			
UNITED STATES OF AMERICA,)	CASE NO.	CASE NO. CR 18-577 CRB
)		
Plaintiff,)		
)		STIPULATION REGARDING BUSINESS RECORDS OF HSBC
v.)		
)		
MICHAEL RICHARD LYNCH and)		
STEPHEN KEITH CHAMBERLAIN,)		
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Defendants.)		
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RECORDS OF HSBC

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STIP RE BUSINESS RECORDS (HSBC)
CASE NO. CR 18-577 CRB

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2			
3	12002	Copy of checks, Premier Bank, Sushovan Hussain	HSBC
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7 DATED: March 14, 2024

Respectfully submitted,

PATRICK D. ROBBINS
Attorney for the United States,
Acting Under Authority Conferred by
28 U.S.C. § 515

/s/

ROBERT S. LEACH
ADAM A. REEVES
KRISTINA N. GREEN
ZACHARY G.F. ABRAHAMSON
Assistant United States Attorneys

16 DATED: March 14, 2024

CLIFFORD CHANCE US LLP

/s/

CHRISTOPHER J. MORVILLO
Attorneys for Defendant Michael Lynch

21 DATED: March 14, 2024

BIRD, MARELLA, BOXER, WOLPERT,
NESSIM, DROOKS, LINCENBERG, &
RHOW, P.C.

/s/

GARY S. LINCENBERG
Attorneys for Defendant Stephen
Chamberlain